



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5



REPLY TO THE ATTENTION OF:

SR-6J

June 17, 1996

John Seymour, P.E.
Woodward-Clyde Consultants
38777 W. Six Mile Rd., Ste. 200
Livonia, MI 48154

Re: Comments on Health and Safety Plan for the Albion-Sheridan Township Landfill Superfund Site

Dear Mr. Seymour:

U.S. EPA's comments on the Health and Safety Plan for the Albion site are enclosed.

Although these are advisory only, I strongly encourage you to revise the plan accordingly and resubmit it to us. I look forward to receiving the revised Workplan this week and a revised Health and Safety Plan when it is available.

Sincerely yours,

Leah H. Evison
Remedial Project Manager

Enclosure

cc w/ encl.: Kurt Lindland, EPA/ORC
Elizabeth Bartz, EarthTech
Kim Sakowski, MDEQ

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: June 14, 1996

SUBJECT: Health and Safety Plan Review, Albion-Sheridan Township
Landfill, Calhoun County, Michigan

FROM: Alan K. Baumann, Health and Safety Officer
Technical Support Section, SRT-4J

TO: Leah Evison, RPM

I have reviewed the Health and Safety Plan (HASP), prepared by Woodward-Clyde Consultants, for the above site and have the following comments:

• I recommend an entry be made in the HASP, preferably at the beginning, that all operations, procedures, and equipment at the site will meet the requirements of OSHA 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response and the applicable subparts of OSHA 29 CFR 1926 and 29 CFR 1910.

• The HASP must not only identify the chemical hazards, but describe the signs and symptoms of exposure, acute and chronic effects of exposure, and likely routes of exposure.

• Noise should be included in the physical hazard section. Occupational noise exposure, including requirements for a hearing conservation program, is regulated by 29 CFR 1926.52. Electrical shock should probably be included as a physical hazard, since electrical service is often required to be brought in at the site, and power tools, monitoring equipment, lighting, etc., is often required at hazardous waste sites. Electrical safety is cited in 29 CFR 1926 Subpart K.

• Section 4.3, Biological Hazards, encourages workers to use insect repellants. Workers should be trained in the method of proper application of the specific repellant that is used at the site. Note, however, that many insect repellants are very volatile, and can contaminate samples and sampling equipment.

• The medical monitoring protocol should be included in the HASP. Any specific medical tests that may be required due to the

known or suspected contaminants should also be listed in the HASP. For instance, arsenic, benzene, lead, and vinyl chloride are all identified contaminants at the site, and all are regulated under OSHA expanded standards which include specific medical monitoring requirements.

• Section 5.6, Respirator Maintenance, Fitting, and Decontamination, is insufficient to meet the requirements of OSHA 1910.134. There must be a written respiratory protection program for the selection, use, and maintenance of the respirators which will be used at the site. The written program must be in accordance with 29 CFR 1910.134.

• In addition to requiring all site personnel to inform the SSO prior to entering the site, I recommend a site sign in/out log be established at the site, requiring workers and visitors to sign in and out of the site. These logs can be used to establish exposure times, and also to establish a head count in the event of an emergency.

• At least three days prior to any excavation at the site, the Project Manager must call "MISS DIG" at 1 800-482-7171, to allow public utilities to identify their underground utilities. When digging or excavating around buried drums or containers, a ground penetrating radar system or device must be used to locate their estimated location and depth in accordance with 29 CFR 1910.120 (j) (1) (x).

• Colorimetric tubes have been selected to monitor for the presence of benzene, hydrogen sulfide, and sulfur dioxide. If vinyl chloride is suspected to be present at the site, it has a PEL of 1 ppm and is a confirmed carcinogen. How will vinyl chloride be monitored?

• I highly recommend that colorimetric tubes only be used to determine the presence of selected contaminants, and not relied upon to determine the concentrations or action levels. Also, colorimetric detector tubes lack the precision required by OSHA for exposure monitoring.

• Unless the chemical hazards at the site have been fully characterized, I recommend the Level C Action Level be set at any sustained HNu/OVA reading above background and less than 5 ppm. And, because there are no air purifying cartridges approved for vinyl chloride, any color change in a vinyl chloride colorimetric

tube would require supplied air/SCBA protection.

• Level C protection is required whenever MiniRam readings are $>2.5\text{mg}/\text{m}^3$ and $<10\text{mg}/\text{m}^3$. What is the basis for this action level?

• An action level is defined for level B protection. Will workers actually be prepared to work in level B?

• Section 8.0, Designation of Work Zones, states the Support Zone is the area where significant exposure to contamination is not expected to occur . . . The Support Zone (or clean zone) must be selected in an uncontaminated area.

• Section 9.0 should be revised to read, All tools or equipment which has been in contact with contaminated materials "must" be decontaminated . . . And, contaminated liquids from the decontamination area and contaminated clothing "will" be disposed of in accordance with approved methods.

• A detailed site map delineating site topography, landmarks, support/decontamination/exclusion zones, evacuation routes, etc., must be included in the HASP. A detailed map depicting the most expedient route to the hospital must also be included. Verification of emergency telephone numbers must be made before workers enter the site.

• Are employees on the site required to provide first aid in the event of a medical emergency? If so, 29 CFR 1910.1030 -- Occupational Exposure to Bloodborne Pathogens must be complied with. Employees who are designated as responsible for rendering first aid or medical assistance as part of their job function are to be covered by this standard. It excludes employees who perform unanticipated "Good Samaritan" acts since such an action does not constitute "occupational exposure." If an employee is trained in first aid and designated by the employer as responsible for rendering medical assistance as part of his or her job duties, that employee is covered by all requirements of the standard, including Hepatitis B vaccination, post exposure incident follow-up, training, and personal protective equipment.

• The names of employees on the site that are first aid/CPR trained must be listed in the HASP.

• A Hazard Communication Plan for the site must be written in

accordance with 29 CFR 1910.1200. Material safety data sheets must be available for all chemicals brought on the site such as: decontamination chemicals, gasoline and other fuels, equipment calibration gasses, etc.

Please feel free to contact me if you have any questions regarding my comments. Also, please complete the attached critique sheet and return it to Steve Ostrodka at SRT-4J.

bcc: S. Ostrodka